

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

IN RE:

THE FINANCIAL MANAGEMENT AND  
OVERSIGHT BOARD FOR PUERTO RICO

as representative of

THE COMMONWEALTH OF PUERTO RICO,  
*et als.*

Debtor

IN RE:

THE FINANCIAL MANAGEMENT AND  
OVERSIGHT BOARD FOR PUERTO RICO

as representative of

EMPLOYEES RETIREMENT SYSTEM OF THE  
GOVERNMENT OF THE COMMONWEALTH  
OF PUERTO RICO

Debtor

IN RE:

THE FINANCIAL MANAGEMENT AND  
OVERSIGHT BOARD FOR PUERTO RICO

as representative of

THE PUERTO RICO HIGHWAYS AND  
TRANSPORTATION AUTHORITY

Debtor

PROMESA  
TITLE III

CASE NO. 17 BK 3283-LTS

(Jointly Administered)

PROMESA  
TITLE III

CASE NO. 17 BK 3566-LTS

(Joint Administration Requested)

PROMESA  
TITLE III

CASE NO. 17 BK 3567 - LTS

(Joint Administration Requested)

**INFORMATIVE MOTION RE:  
ORDER REGARDING PROCEDURES FOR ATTENDANCE AND OBSERVATION OF  
AUGUST 9-10, 2017, OMNIBUS HEARING**

TO THE HONORABLE JUDGE LAURA TAYLOR SWAIN:

NOW COMES creditors TAMRIO, INC. (“TAMRIO”), CONSTRUCTORA SANTIAGO II, CORP. (“CSII”), FERROVIAL AGROMAN, S.A. (“FASA”), FERROVIAL AGROMAN, LLC (“FALLC”) **parties in interest in the PROMESA TITLE III Case No. 17 BK 3567-LTS** (collectively “The Appearing Party”) represented by the undersigned law office and respectfully sets forth and prays:

1. That the Appearing Party filed independent motions to compel Puerto Rico Highways and Transportation Authority (“PRHTA”) to Assume or Reject certain executory contracts fully described in their respective motions (the “Motions to Compel”). See docket entries # 192, 194, 203 and 204 in 17 BK 3567 LTS.
2. On July 21, 2017, the Honorable Judge Laura Taylor Swain issued a “Scheduling Order Regarding Certain Motions to Compel” (docket # 206 in 17 BK 3567 LTS) whereby granted respondent PRHTA until July 28, 2017 to file its opposition to the Motion to Compel and granted movant until August 3, 2017 to file its reply papers. The contested matter was scheduled for a hearing to be held on August 9, 2017 at 9:30 a.m. (EST). See docket entry # 206.
3. On July 28, 2017 respondent PRHTA filed an Omnibus Objection of Debtors to Motions to Compel the Puerto Rico Highway and Transportation Authority to Assume or Reject Executory Contracts (the “Omnibus Objection”) to the Motion to Compel filed by FASA. See docket # 216 in 17 BK 3567 LTS.
4. That pursuant to the provisions of the “Scheduling Order Regarding Certain Motions to Compel” notice is hereby given to the Court that the Appearing Party respectfully request to be heard in the United States District Court for the District of Puerto Rico at the August 9, 2017 hearing to be held as to the Motions to Compel and the Omnibus Objection filed thereto.

WHEREFORE the undersigned respectfully requests from the Honorable Court to take notice of this motion and to provide accordingly.

#### **CERTIFICATE OF ELECTRONIC FILING AND SERVICE**

I hereby certify that on even date, I electronically filed the foregoing with the Clerk of the Court

using the CM/ECF system which will send notification of such filing to the following: to all attorneys that have filed their respective notice of appearance and to the Standard Parties as such term is defined in the Court's Order Establishing Case Management Procedures, supra:

- (i) Chambers of the Honorable Laura Taylor Swain (two copies shall be delivered to each chambers listed below):

United States District Court for the District of Puerto Rico  
150 Carlos Chardón Street,  
Federal Building, Office 150,  
San Juan, P.R. 00918-1767

-and-

United States District Court for the Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl St., Suite No. 3212  
New York, New York 10007-1312

- (ii) Office of the United States Trustee for Region 21  
Edificio Ochoa, 500 Tanca Street, Suite 301  
San Juan, PR 00901-1922

- (iii) Puerto Rico Fiscal Agency and Financial Advisory Authority (AAFAF):

Puerto Rico Fiscal Agency and Financial Advisory Authority  
Roberto Sánchez Vilella (Minillas) Government Center  
De Diego Ave. Stop 22  
San Juan, Puerto Rico 00907  
Attn: Gerardo J. Portela Franco  
Mohammad Yassin, Esq.  
E-Mail: Gerardo.Portela@aaafaf.pr.gov  
Mohammad.Yassin@aaafaf.pr.gov

- (iv) Counsel for AAFAF:

O'Melveny & Myers LLP  
7 Times Square  
New York, New York 10036  
Attn: John J. Rapisardi, Esq.  
Suzanne Uhland, Esq.  
Peter Friedman, Esq.  
Diana M. Perez, Esq.  
E-Mail: jrapisardi@omm.com  
suhland@omm.com  
pfriedman@omm.com  
dperez@omm.com

Law Offices of Andrés W. López, Esq.  
902 Fernández Juncos Ave.  
San Juan, PR 00907  
Attn: Andrés W. López, Esq.  
E-Mail: andres@awllaw.com

(v) Counsel for the Oversight Board:

Proskauer Rose LLP  
Eleven Times Square  
New York, New York 10036-8299

Attn: Martin J. Bienenstock  
Paul V. Possinger  
Ehud Barak  
Maja Zerjal  
Chris Theodoridis

E-Mail: mbienenstock@proskauer.com  
ppossinger@proskauer.com  
ebarak@proskauer.com  
mzerjal@proskauer.com  
ctheodoridis@proskauer.com

O'Neill & Borges LLC  
250 Muñoz Rivera Ave., Suite 800  
San Juan, PR 00918-1813  
Attn: Hermann D. Bauer, Esq.  
E-Mail: herman.bauer@oneillborges.com

And I hereby certify that I have mailed by United States Postal Service the document to the following non CM/ECF participants: to the members of the Creditors' Committee at their postal address of record.

In San Juan, Puerto Rico, on the 07<sup>th</sup> day of August, 2017.

CARDONA JIMENEZ LAW OFFICES, PSC  
Attorney for The Appearing Party  
PO Box 9023593  
San Juan, PR 00902-3593  
Tel: (787) 724-1303, Fax (787) 724-1369  
E-mail: [jf@cardonalaw.com](mailto:jf@cardonalaw.com)

*s/José F. Cardona Jiménez*, USDC PR 124504  
[jf@cardonalaw.com](mailto:jf@cardonalaw.com)